



Oregon Natural Desert Association

January 30, 2008

VIA EMAIL

Rob Perrin
Outdoor Recreation Specialist
Bureau of Land Management
28910 Hwy 20 West
Hines, OR 97738
SteensRecPlan@blm.gov

Re: Scoping comments for Steens Mountain Comprehensive Recreation Plan

Dear Mr. Perrin:

I submit these comments on behalf of the Oregon Natural Desert Association (“ONDA”), in response to BLM’s January 2008 notice concerning the proposed “Comprehensive Recreation Plan” for the Steens Mountain Cooperative Management and Protection Area.

As you are aware, we feel BLM is in continuing violation of the Steens Act’s comprehensive transportation planning provision. 16 U.S.C. §§ 460nnn-21(b), 22(a); see also Ore. Natural Desert Ass’n v. Shuford, 2007 WL 1695162, at *18–19 (D. Or. June 8, 2007) (holding that the transportation plan included as Appendix M to the CMPA RMP is not “comprehensive” or “integral” and that “the transportation plan fails to address travel on hiking trails as is unambiguously required by the statute”). We have articulated this position in the context of the Shuford litigation as well as in our administrative appeal of the Steens Mountain Travel Management Plan (“TMP”). Ore. Natural Desert Ass’n v. Bureau of Land Mgmt., IBLA 2008-59 (filed Jan. 4, 2008).

ONDA hereby incorporates by reference all of our previous comments on the CMPA RMP transportation plan and the TMP. We ask BLM to go back to square one and prepare a truly “comprehensive,” “integral” transportation plan, taking into account both motorized and nonmotorized uses, considering closing to motorized use trails shown to be obsolete, redundant or damaging to resources, reconsidering authorization of use of motorized vehicles by the general public in Wilderness Study Areas, and considering the impacts of maintaining status quo motorized use on non-motorized uses and values on Steens Mountain. ONDA further requests that BLM expand opportunities for primitive, non-motorized recreation on Steens.

As part of your NEPA analysis, please consider ONDA’s: September and November 2002 wilderness inventory report and recommendations; transportation and travel planning comments made during the Andrews-Steens RMP planning process; Jan. 22, 2003 report and

road closure recommendations; November 2006 transportation planning recommendations and GIS information; and the comments, maps and comprehensive transportation planning recommendations data and analyses provided in January and May 2007 during the TMP planning process.

As we have commented previously, every aspect of this environmental analysis and final decision must be filtered through the single, underlying purpose for the Cooperative Management and Protection Area (“CMPA”):

The purpose of the Cooperative Management and Protection Area is to conserve, protect, and manage the *long-term ecological integrity* of Steens Mountain for future and present generations.

16 U.S.C. § 460nnn-12(a) (emphasis added). This is the key criterion BLM must use in making its determinations on route closures and trail designations, and in providing for motorized and non-motorized recreation and other use of roads and trails, as required by the Steens Act. Id. § 460nnn-22(a) & (b).

Thank you for the opportunity to participate in this public land management planning process and for your careful consideration of ONDA’s comments. Please retain ONDA (both the Bend and Portland offices) on your mailing list for this project.

Sincerely,

s/ Peter M. Lacy

Peter M. Lacy (“Mac”), Senior Attorney
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Cc: Brent Fenty, Executive Director
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